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February 13, 2015

VIA ECF

Honorable Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: American Stevedoring, Inc. v. International Longshoremen's Ass'n, AFL-CIO
Civil Action No.: 1:13-CV-00918 (KPF)

Dear Judge Failla:

We write in connection with the Court's January 16, 2015 Order (Docket # 103), which lifted the stay in this case, removed it from the suspense calendar, and placed it on the active calendar.

We are pleased to report that the parties have executed a settlement agreement. The settlement contemplates that a certain approval be obtained from a third party prior to consummation of the settlement. The settlement agreement is subject to a confidentiality provision that prohibits publishing the name of the third party. However, if the Court requests, the name of the third party will be disclosed in camera. It is expected that that approval will be provided shortly. In that regard, we respectfully request that this Court return this matter to the "suspense calendar," until the settlement is completed.

This letter has been circulated to all of the parties to the settlement agreement and all of the parties have approved.

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We will provide an update within thirty days of the date of this letter concerning the status of the settlement. Thank you for your consideration.

Respectfully submitted,

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